



ENVIRONMENTAL LAW & POLICY CENTER

Illinois Indiana Michigan Minnesota Ohio Wisconsin

April 27, 2005

Harry Stoller
Illinois Commerce Commission
527 East Capitol Ave
Springfield, IL. 62701

Dear Mr. Stoller:

The Environmental Law & Policy Center ("ELPC") appreciates this opportunity to file comments on the implementation plans presented by Com Ed and Ameren related to the Illinois Sustainable Energy Plan. Our comments will focus on the Renewable Portfolio Standard plans.

Timeline

ELPC believes that the Commission should develop a compliance timeline which allows for all the necessary steps to occur so that projects are operating by the end of calendar year 2006. While there are multiple, important issues both developers and utilities need to work through during this process, it is critical that those issues be resolved in as expeditious a manner as possible. Projects operating before the end of 2006 will very likely realize the economic benefits of the Production Tax Credit. The cost savings associated with the PTC will reduce the cost of renewable energy to utility customers. We urge the Commission to adopt a tight compliance timeline so as much lowest cost renewable energy flows to Illinois customers as possible.

ICC Oversight

ELPC believes the ICC should establish an annual oversight process which will examine compliance by utilities. This process should include the issuance of a report which would detail the amount of renewable energy each utility was required to procure to meet the RPS, the actual amount of renewable energy procured by each utility, the surplus or deficit the generated energy represents relative to the requirement for that year, the generation source of the renewable energy, the cost of compliance, the benefit of compliance, and technical problems with compliance. Information for this report should be delivered by the utilities to the Commission on a quarterly basis so that if there are problems with the RPS they may be resolved immediately, not at the end of a reporting year. This report should be made available to the public within 30 days of the end of the reporting year.

Sincerely,

Howard Learner
Executive Director

CC: Michelle Mishoe